

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

DWAYNE HASKINS, SR., TAMARA,
HASKINS, TAMIA HASKINS, AND HASKINS
FAMILY FOUNDATION, INC.

Civil Action

No. 2:24-CV-1085

Plaintiffs,

v.

KALABRYA HASKINS,

Defendant.

CONSENTED TO MOTION FOR EXTENSION OF TIME

Now comes Defendant KALABRYA HASKINS, through Lisa G. Michel and Bacharach and Michel and files this Motion for Extension of Time and avers as follows:

1. The Plaintiffs filed the instant Complaint on July 31, 2024.
2. The Plaintiffs averred in the Complaint that Defendant was a resident of Georgia. ECF 1, ¶8.
3. Plaintiffs attempted service at the Georgia address, but aver they were unable to effectuate service.
4. Thereafter, Plaintiffs sought an order for alternate service on September 16, 2024, (ECF 19) which this Court granted, (ECF 21), and counsel for Plaintiffs mailed the Complaint and filed an affidavit confirming same was transmitted on September 19, 2024. ECF 22.
5. The individual parties are all parties in the Estate of Dwayne Haskins, Jr. in the Court of Common Pleas of Allegheny County Orphans' Court Division, at Case No. 02-22-02841.

6. A mediation was held on September 30, 2024, which Defendant attended, and she was served with the redacted Complaint and its Exhibits by a process server.

7. Defendant had moved to Florida and the redacted Complaint she was served on September 30, 2024 is the sole copy she has received.

8. The undersigned entered her appearance on October 2, 2024. ECF 23.

9. On Monday, October 7, 2024, counsel for the parties met by teleconference. The parties discussed issues that may be raised in Defendant's Motion to Dismiss, the Defendant's seeking a copy of the unredacted copy of the Complaint and Plaintiffs' opposition to providing an unredacted copy of the Complaint as it is under seal. Defendant requested additional time to file a responsive pleading pending the court's consideration of her request for a copy of the unredacted copy of the Complaint.

10. The served Complaint is heavily redacted and Defendant asserts in the Motion for an Unredacted Copy of the Complaint filed simultaneous with this instant Motion for Extension of Time, that it impossible to respond without an unredacted copy.

11. Defendant requests, and Plaintiffs' counsel has confirmed on October 8, 2024 via email the Plaintiffs' consent for an Order granting an extension of time to fourteen (14) days after the Court enters an Order on the Motion for an Unredacted copy of the Complaint.

WHEREFORE Defendant respectfully requests this Court to enter an Order granting the consented to extension of time to file her responsive pleading.

Respectfully submitted,

/s/ Lisa G. Michel
Lisa G. Michel
Pa. I.D. #59997

Counsel for Defendant
Kalabrya Haskins

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